

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

SAMUEL JOSEPH ORLANDO,

Plaintiff,

v.

No.: 5:22-cv-00062-MFU

DONALD SMITH, *et al.*

Defendants.

MOTION TO WITHDRAW

I, Zachary Lawrence, of the Lawrence Law Firm PLLC, represent Plaintiff Samuel Orlando and request that this Court permit me to withdraw as counsel of record, and state the following in support thereof:

1. Pursuant to Rule 1.16 of the Rules of Professional Conduct of the Virginia State Bar, undersigned counsel is unable to continue to represent the plaintiff in this matter.
2. Specifically, Rule 1.16(a)(3) provides that a lawyer “shall not represent a client” and “shall withdraw” where the “lawyer is discharged.”
3. I was previously discharged, with the discharge to become effective on November 5, 2024. Mr. Orlando expressed his concrete intent to discharge me and terminate my services in or about October of 2024, and formally did so approximately two-

1 weeks ago, specifically stating that the discharge was to become effective today,
2 November 5, 2024.
3

4 4. I have fulfilled the requirements of subsection (d) and did so prior to my
5 termination and/or discharge. I provided notice to my client on June 1, 2024, that
6 my withdrawal would likely be necessary; it was later agreed, in or about July, that
7 I would remain in the case until the first of three events: (1) my discharge; (2) the
8 conclusion of mediation; or (3) substitution.
9

10 5. Mr. Orlando chose to discharge me effective today, and thus in compliance with
11 Rule 1.16(a) I can no longer represent him and am filing the instant motion.
12

13 6. If the Court finds it necessary and should the Court desire more detailed
14 information as to the propriety of my withdrawal, I have prepared a detailed
15 declaration, as well as a motion to seal, which could be filed under seal to
16 supplement this motion.
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19 WHEREFORE, Zachary Lawrence, counsel for Plaintiff, respectfully moves this
20 Court for entry of an Order permitting him to immediately withdraw as counsel of
21 record in this case.
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1 Dated: November 5, 2024

2 Cold Brook, NY

3 Respectfully submitted,
4 /s/Zachary Lawrence
5 Lawrence Law Firm PLLC
6 166 Five Acres Ln
7 Cold Brook, NY 13324
8 202-468-9486
9 zach@zlawpllc.com
10 *Pro hac vice* (NY Bar No.: 5798202)
11 *Attorney for Plaintiff*
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CERTIFICATE OF SERVICE AND FILING

I hereby certify that on November 6, 2024, I electronically filed the foregoing document with the Clerk of the court for the Western District of Virginia.

I further certify that I have served, by “mailing” all of the foregoing to the following non-CM/ECF participants to their last known addresses in compliance with Rule 5(b)(2)(C):

Rebecca Neal
2105 Park Ave.
Lynchburg, VA 24501
PRO SE

Bristol Neal
2105 Park Ave.
Lynchburg, VA 24501
PRO SE

Dated: *November 6, 2024*

/s/Zachary Lawrence

Zachary Lawrence